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Arizona Corporation Commission

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**BEFORE THE ARIZONA POWER PLANT AND
TRANSMISSION LINE SITING COMMITTEE**

IN THE MATTER OF THE APPLICATION)
OF SALT RIVER PROJECT)
AGRICULTURAL IMPROVEMENT AND)
POWER DISTRICT ON BEHALF OF)
ITSELF AND ARIZONA PUBLIC SERVICE)
COMPANY, SANTA CRUZ WATER AND)
POWER DISTRICTS ASSOCIATION,)
SOUTWEST TRANSMISSION)
COOPERATIVE, INC. AND TUCSON)
ELECTRIC POWER IN CONFORMANCE)
WITH THE REQUIREMENTS OF)
ARIZONA REVISED STATUTES SECTION)
40-360, et. seq., FOR A CERTIFICATE OF)
ENVIRONMENTAL COMPATIBILITY)
AUTHORIZING THE CONSTRUCTION OF)
THE PINAL WEST TO SOUTHEAST)
VALLEY/BROWNING PROJECT,)
INCLUDING THE CONSTRUCTION OF)
TRANSMISSION LINES FROM PINAL)
WEST TO THE BROWNING SUBSTATION)
AND OTHER INTERCONNECTION)
COMPONENTS IN PINAL AND)
MARICOPA COUNTIES, ARIZONA.)

Docket No.: L-00000B-04-0126

Case No. 126

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AZ CORP COMMISSION
DOCUMENT CONTROL

NOTICE OF FILING

NOTICE IS HEREBY GIVEN that Intervenor Del Mar Development and Robert and Rob Knorr of Knorr Farms ("Del Mar"); Trinity Baptist Church; and Mike Hastings,

San Tan Tillage Company, David M. and Rebecca Daley, and Coolidge Investment Properties, L.L.C., (collectively the "Curry Road Group"), by and through their undersigned counsel, give notice of this filing of their presentation slides for closing argument. The Intervenor's closing argument presentation slides are attached as Attachment A (Del Mar), Attachment B (Trinity Baptist Church), and Attachment C (the Curry Road Group), respectively.

DATED this 3rd day of May, 2005.

QUARLES & BRADY STREICH LANG LLP
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Phoenix, AZ 85004-2391

By Roger Ferland
Roger K. Ferland
Michelle De Blasi

Attorneys for the Intervenor's

ORIGINAL + 40 copies filed this
3rd day of May, 2005, with:

Arizona Corporation Commission
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3rd day of May, 2005, to:

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By Sarah Menne

ATTACHMENT “A”

OUTLINE OF CLOSING ARGUMENT FOR AREA A

Roger K. Ferland, Esq.
QUARLES & BRADY STREICH LANG, LLP
on behalf of
DEL MAR DEVELOPMENT, INC. AND KNORR FARMS
for Hidden Valley Ranch Development

Our Position: In support of SRP's Preferred Route from the Pinal West Substation through Node 198 to Node 205.

I. HOW THE ROUTE WAS CHOSEN.

A. Committee has encouraged landowners and developers to undertake a consensus-building process that requires notice and consultation with all affected parties before a CEC application is filed.

1. Del Mar held at least eight meetings with SRP and meetings with the Arizona State Land Department and BLM. Met with the neighbors in mid-August 2004 meeting (that Del Mar called), SRP Open House on September 9 and September 30.

2. Result:

a. SRP chose route as its Preferred Route.

b. Neighborhood support for the development and the route.

B. Compromise.

1. Preferred route only slightly longer than Segment Option that would bisect Property along the pipeline.

2. Route is on the Property along its southern boundary.

3. Better environmentally.

a. Preserves western and northern viewsheds.

b. Minimizes other impacts from noise, other factors.

c. Easier to mitigate impacts in the planned development process from transmission line on property boundary, rather than in broad corridor required for collocated electric line and natural gas pipeline through the middle of Property.

Source: Testimony of Rod Morris; Tr. pp. 982-999.

II. THE RELIABILITY ISSUE.

A. Only issue raised about Preferred Route was Staff's proposed alternative through node 151.

1. Will impair Property's most important viewshed – to the west.

B. Staff justification was reliability because Preferred Route follows existing utility corridor out of Pinal West.

1. SRP line in utility corridor with existing TEP line, potential future lines.

C. HOWEVER,

1. Collocation is common for lines entering and leaving a major substation.
2. Lines are collocated for only three quarters of a mile.
3. Reliability exposure for Preferred Route "slight" (SRP's reliability expert: Harlow Peterson, Tr. p. 839).
4. Reliability risks from ¾ mile common corridor "certainly acceptable." (SRP's Rob Kondziolka on several occasions in the transcript).
5. On my cross-examination, Staff's witness, Jerry Smith, refused to contradict Kondziolka's characterization of reliability risk as "acceptable."

**Pinal
West**

N147 N148

N149

N150

N198

N151

N205

Table Top Rd

Sage Rd

N204

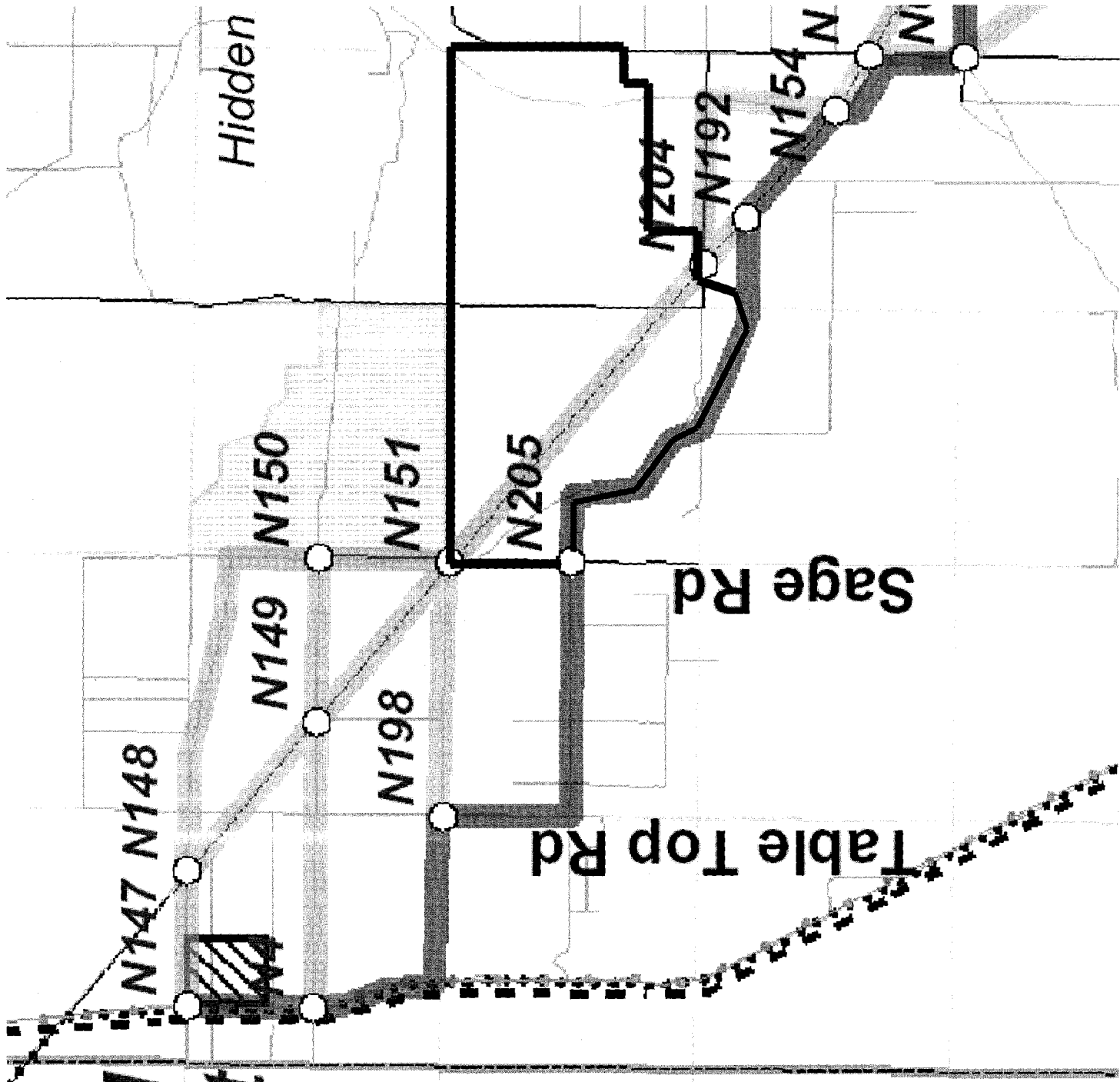
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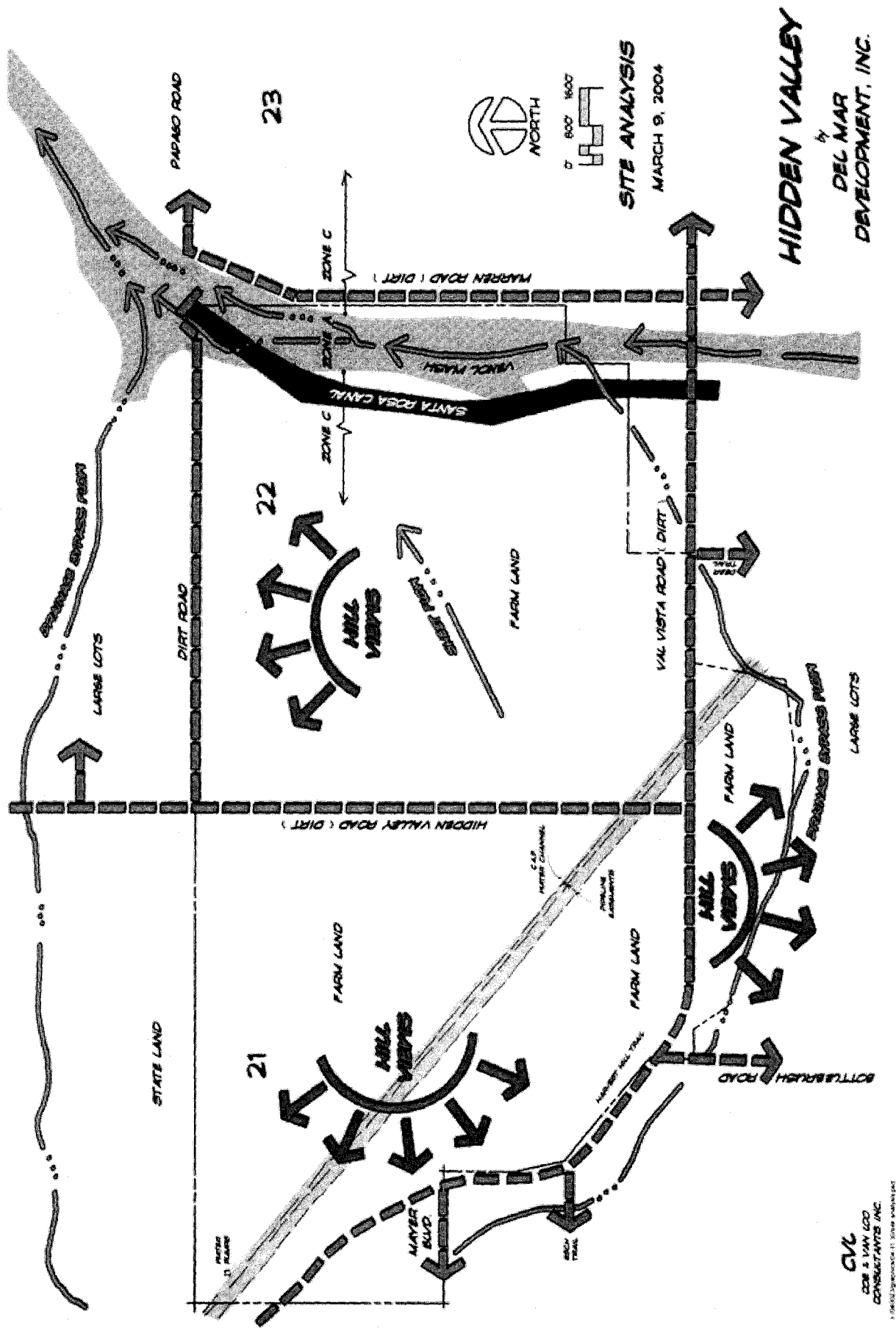
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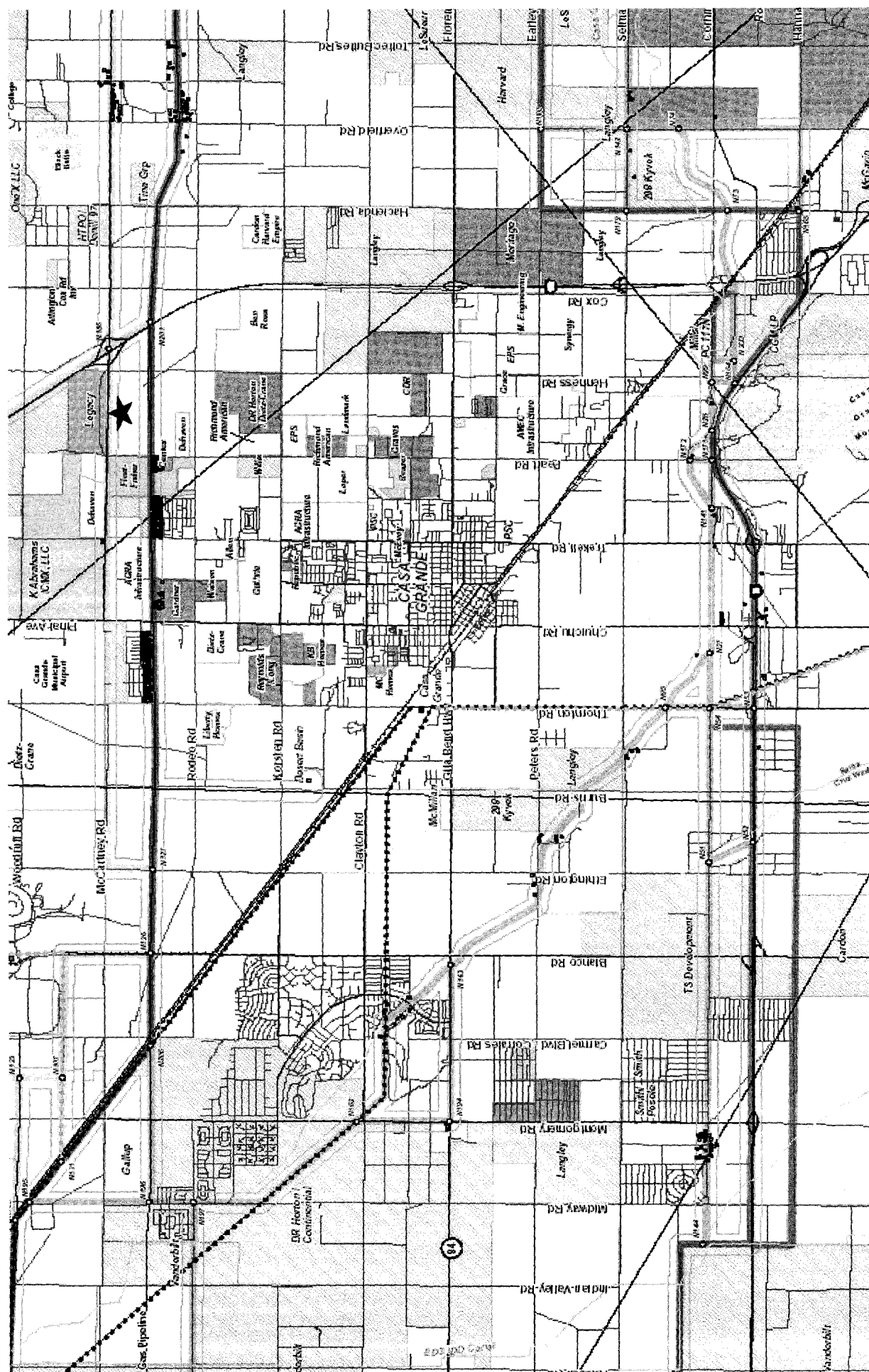


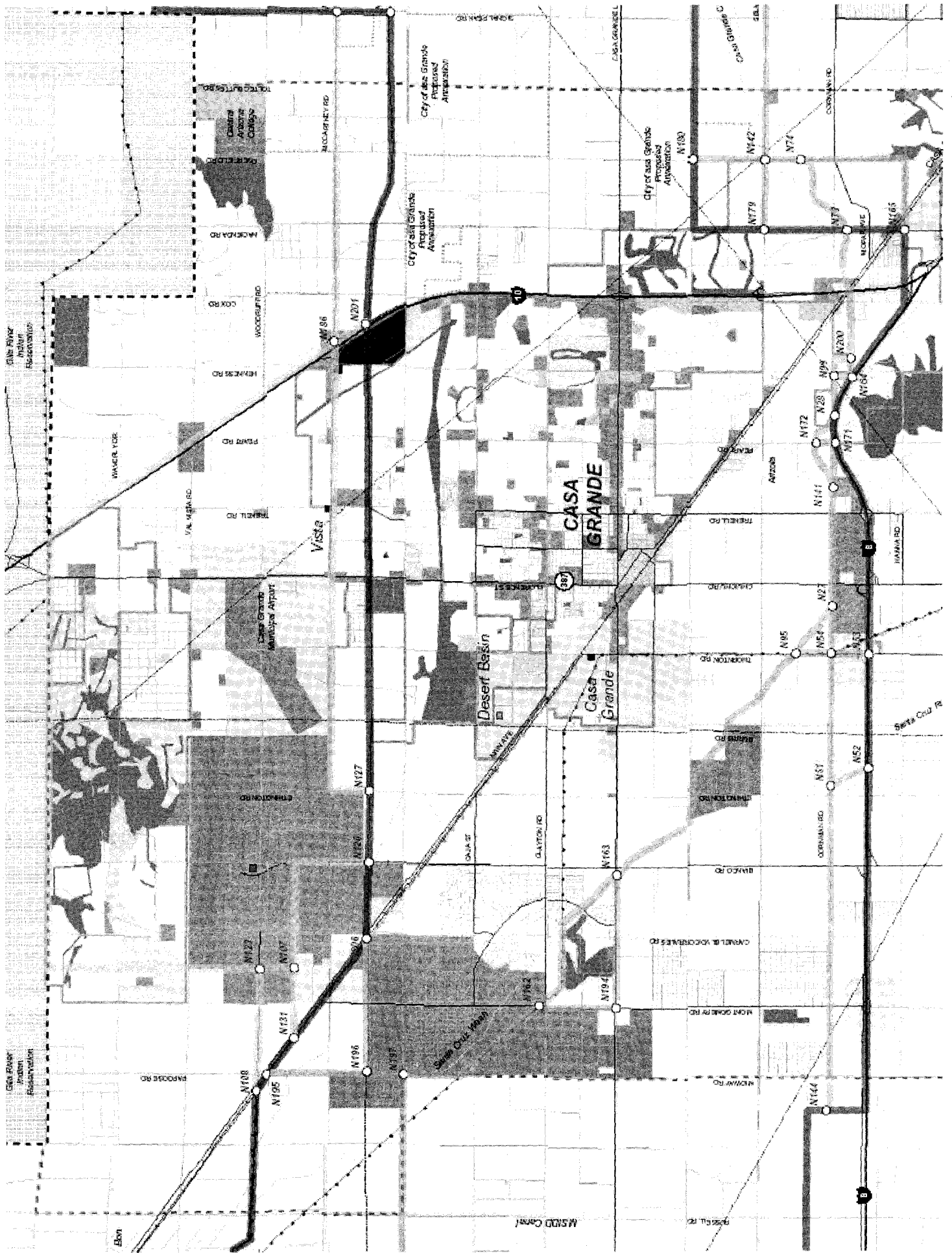


DM-5

Exhibit D

ATTACHMENT “B”





Area B

Comparison with Preferred Alignment

Northern Alternatives

- ✗ Affects the most existing houses, churches and schools of all of the routes in Area B. (**ARS 40-360.06(1)**) (SRP's Exh. A-33-b)

- ✗ Potential to interfere with the airport, especially on the McCartney alignment (**ARS 40-360.06(4)**) (Testimony of Chavkin)

Preferred Alignment

- ✓ Affects fewer houses and PADs; PADs accept routing near or on their property.
- ✓ Does not interfere with the Casa Grande airport.

Area B

Comparison with Preferred Alignment

Northern Alternatives

- ✗ Ignores the City of Casa Grande's planning objectives and strong public opposition. (ARS 40-360.06(1))

Preferred Alignment

- ✓ Acknowledges the City of Casa Grande's planning objectives, and the public's strong opposition to the northern alternatives.
- ✓ Preferred Alignment makes the most sense near the industrial corridor near I-8. (Testimony of Ms. Jackie Guthrie, one of the only certified land planners to testify (Vol. VII, 1/11/05, page 1823, lines 12-25)).

Area B

Comparison with Preferred Alignment

Northern Alternatives

- ✗ Presents safety issue, whether real or perceived, of siting 500 kV line along natural gas pipeline. (ARS 40-360.06(4))
- ✗ Precludes ability to build Pinal South in this application, thereby forcing another hearing process in the future. (ARS 40-360.06(7)(8))
- ✗ Additional costs of property acquisition and the net cost to the other participants have not been considered.

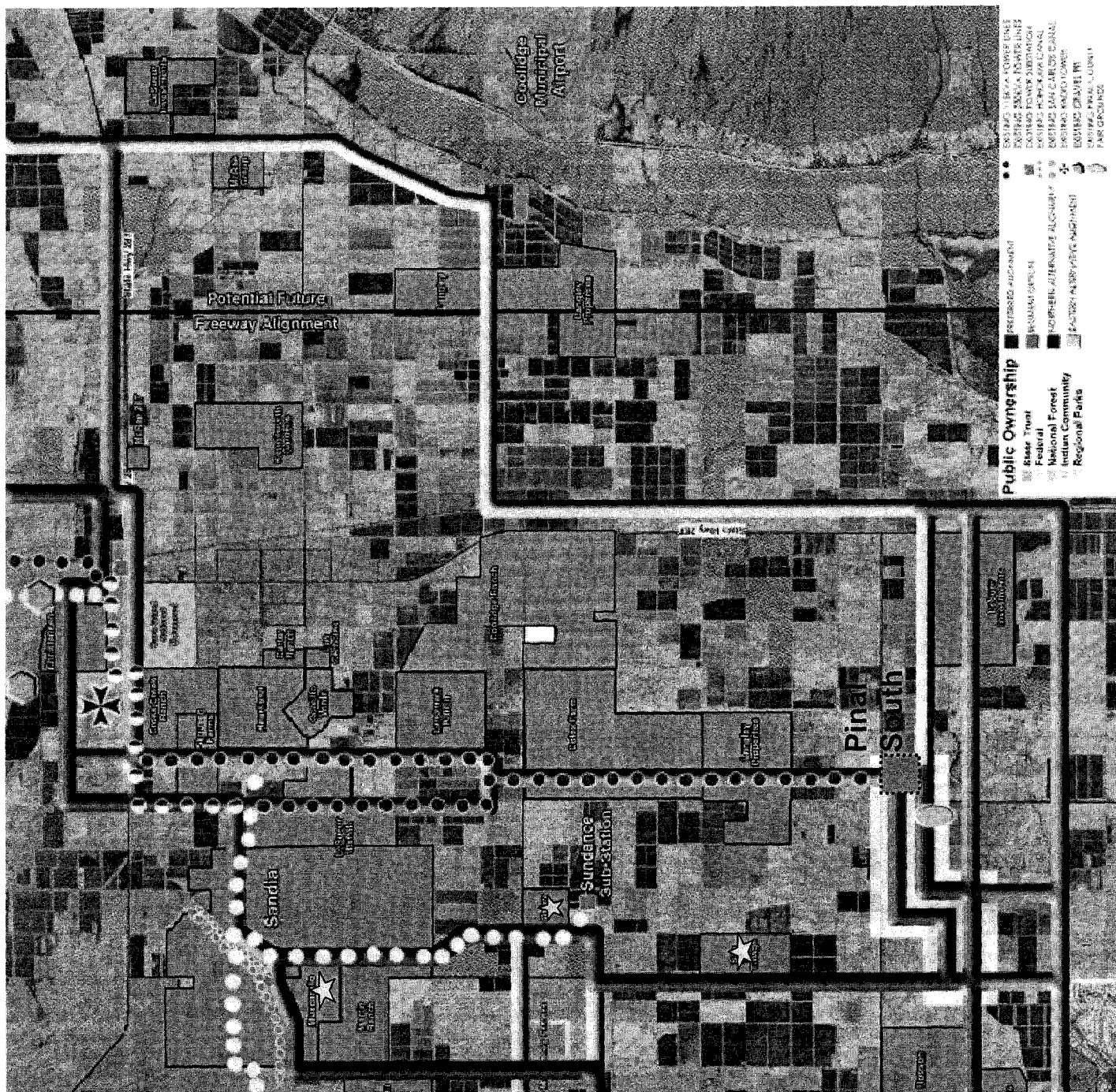
Preferred Alignment

- ✓ Obviates the safety issue of siting a 500kV line near a natural gas pipeline.
- ✓ SRP testified that the building of Pinal South is important for the participation of other participants. (Kondziolka, Vol. I, 11/29/04, page 209, lines 6-19)

ATTACHMENT “C”

A.R.S. 40-360.06

1. Existing plans of the state, local government and private entities for other developments at or in the vicinity of the proposed site.



Area C Route Comparison

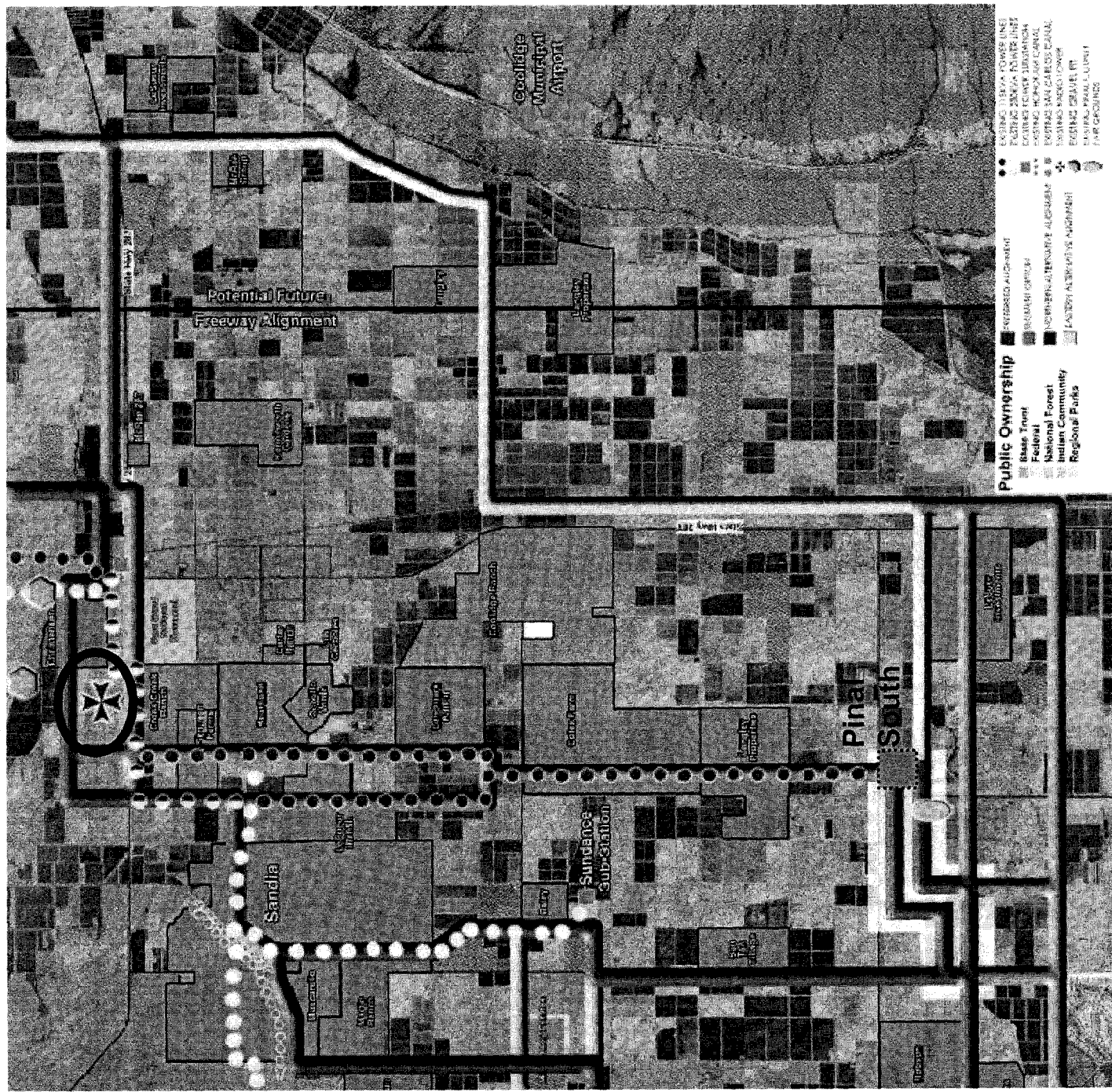
CEC Issuance Criteria	Preferred Route	Compromise (Green) Route
1. Existing plans of the state, local government and private entities for other developments at or in the vicinity of the proposed site.		✓

Area C Route Comparison

CEC Issuance Criteria	Preferred Route	Compromise (Green) Route
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2. Fish, wildlife and plant life and associated forms of life upon which they are dependent.

3. Noise emission levels and interference with communication signals.



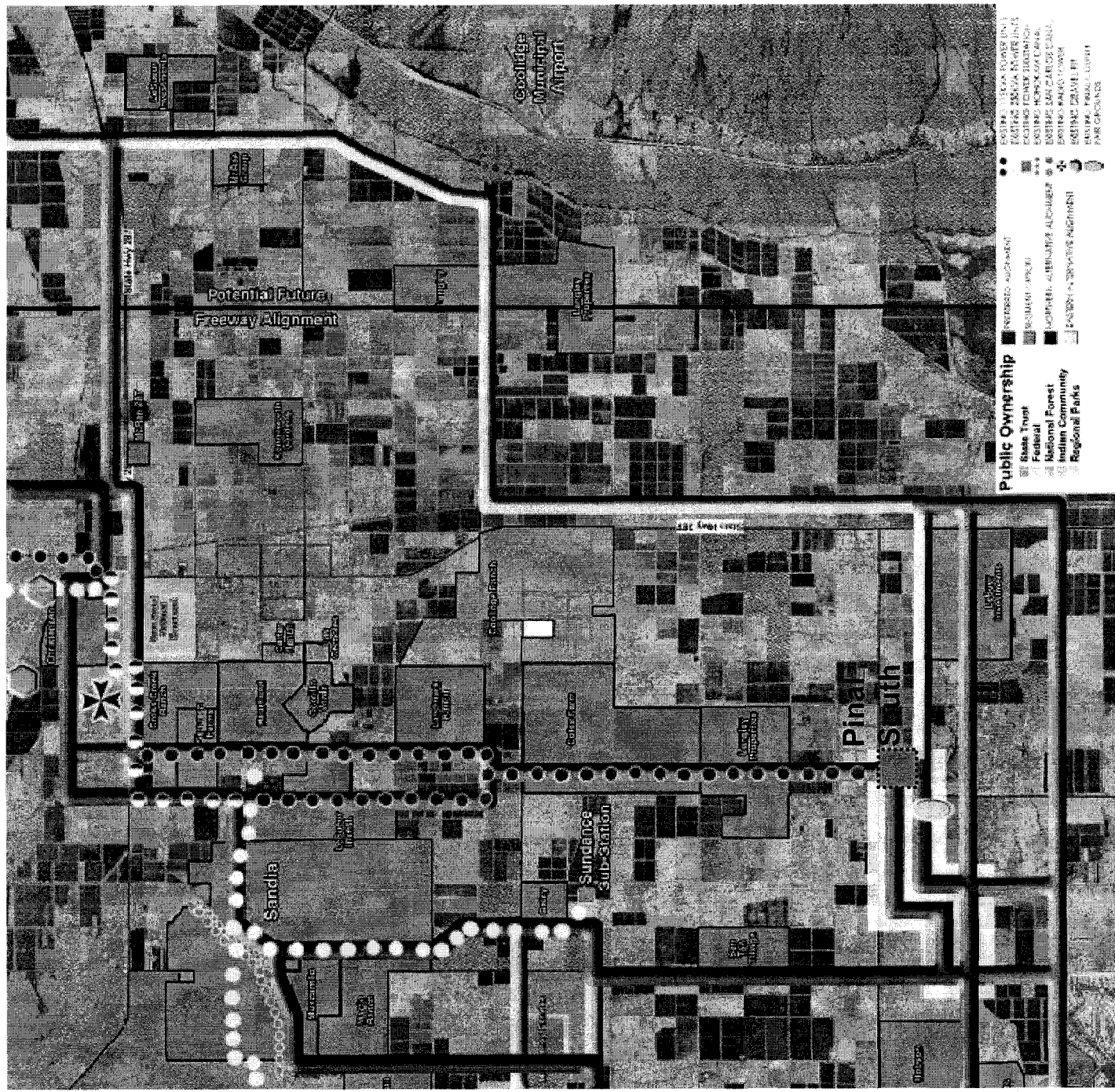
Area C Route Comparison

CEC Issuance Criteria	Preferred Route	Compromise (Green) Route
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- | | | |
|---|--|--|
| 3. Noise emission levels and interference with communication signals. | | |
|---|--|--|



4. The proposed availability of the site to the public for recreational purposes, consistent with safety considerations and regulations.



Area C Route Comparison

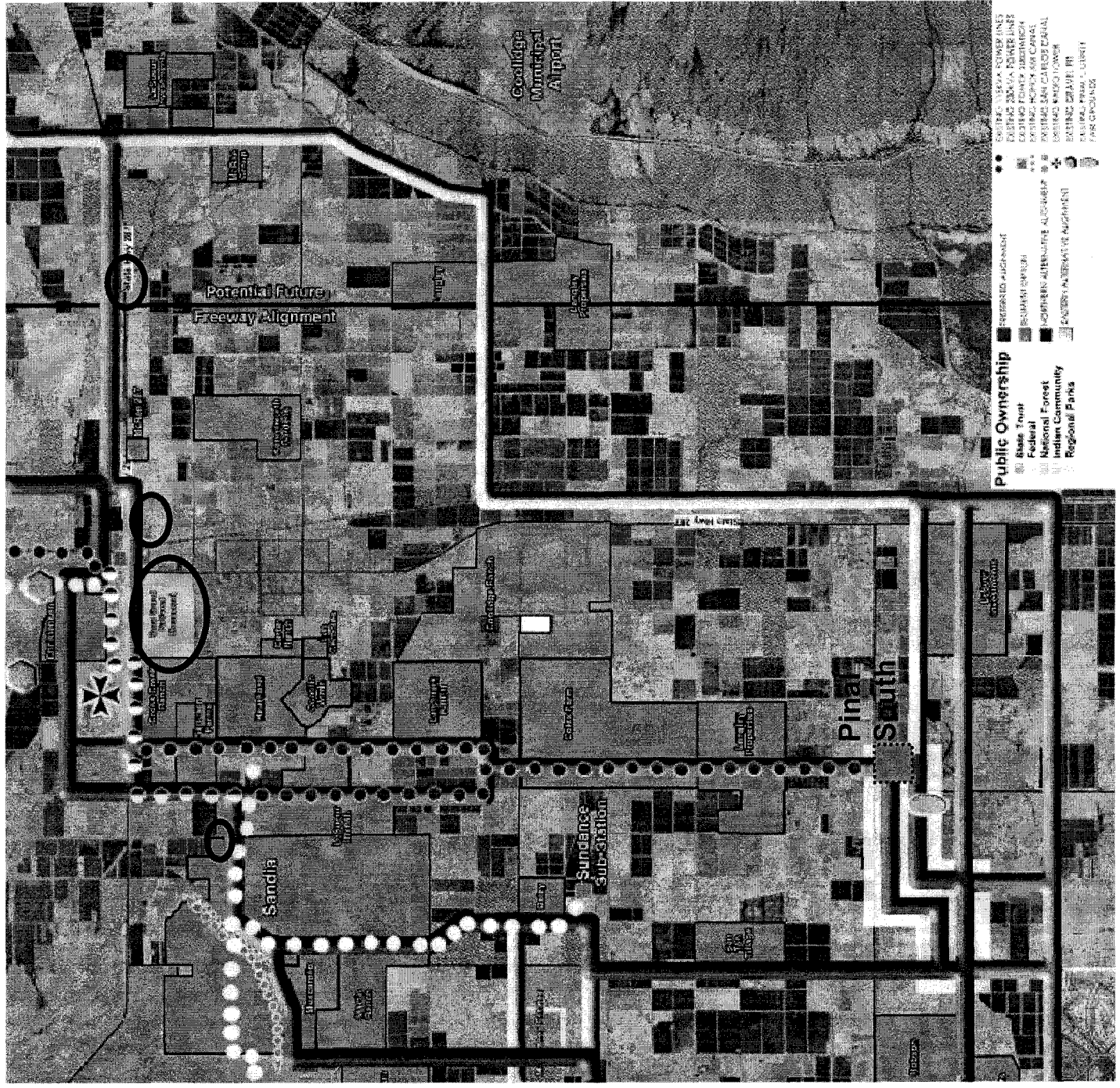
CEC Issuance Criteria	Preferred Route	Compromise (Green) Route
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4. The proposed availability of the site to the public for recreational purposes, consistent with safety considerations and regulations.



A.R.S. 40-360.06

5. Existing scenic areas, historic sites and structures or archaeological sites at or in the vicinity of the proposed site.



Area C Route Comparison

CEC Issuance Criteria	Preferred Route	Compromise (Green) Route
5. Existing scenic areas, historic sites and structures or archaeological sites at or in the vicinity of the proposed site.		✓

Area C Route Comparison

CEC Issuance Criteria	Preferred Route	Compromise (Green) Route
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6. The total environment of the area.

Area C Route Comparison

Compromise
(Green) Route

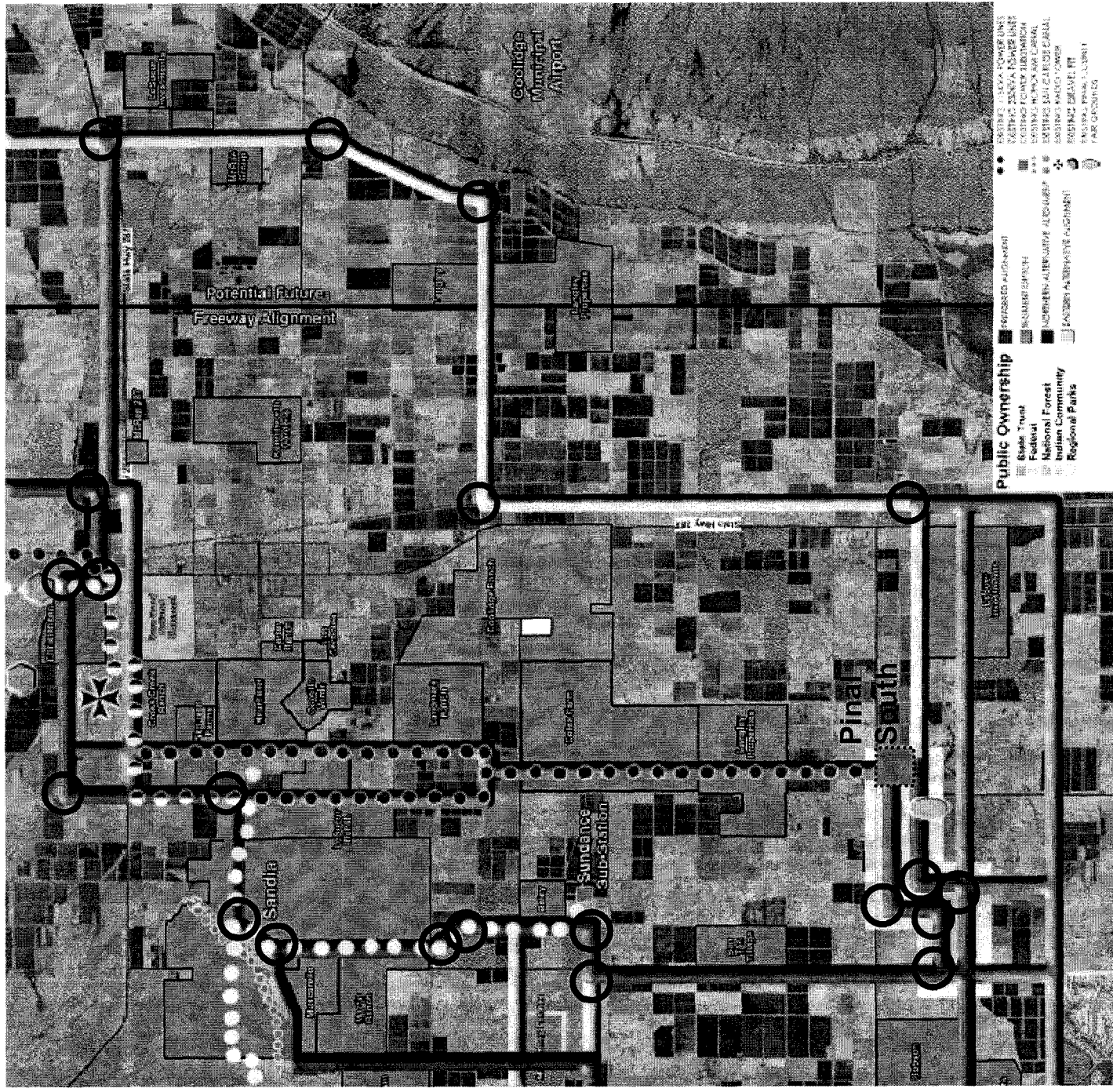
CEC Issuance Criteria

Preferred Route

7. The technical practicability of achieving a proposed objective and the previous experience with equipment and methods available for achieving a proposed objective.

A.R.S. 40-360.06

8. The estimated cost of the facilities and site as proposed by the applicant and the estimated cost of the facilities and site as recommended by the committee, recognizing that any significant increase in costs represents a potential increase in the cost of electric energy to the customers or the applicant.



Area C Route Comparison

CEC Issuance Criteria

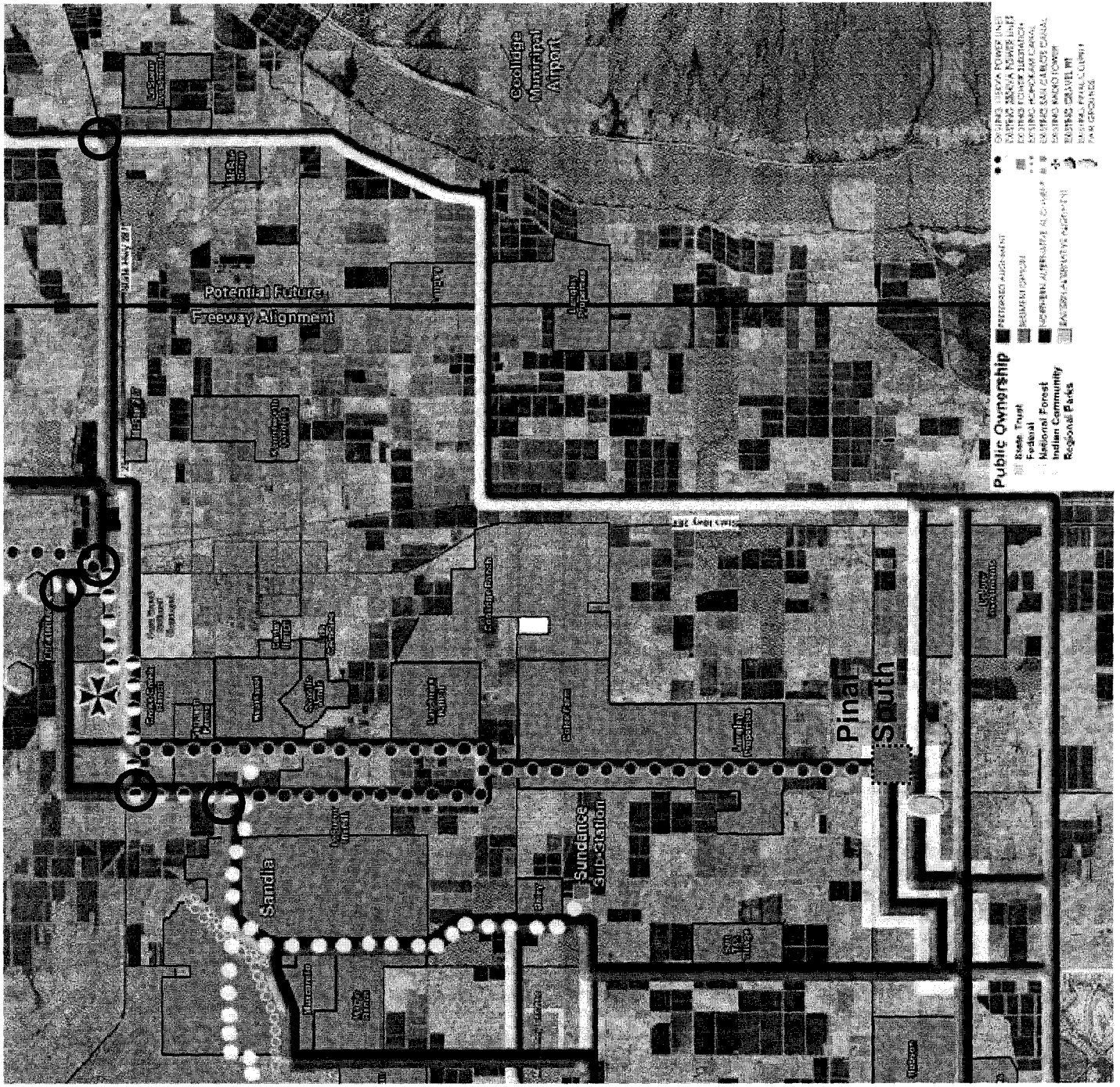
Preferred Route

Compromise
(Green) Route

8. The estimated cost of the facilities and site as proposed by the applicant and the estimated cost of the facilities and site as recommended by the committee, recognizing that any significant increase in costs represents a potential increase in the cost of electric energy to the customer or the applicant.



9. Any additional factors which require consideration under applicable federal and state laws pertaining to any such site.



Area C Route Comparison

CEC Issuance Criteria	Preferred Route	Compromise (Green) Route
-----------------------	-----------------	-----------------------------

- | | | |
|--|--|---|
| 9. Any additional factors which require consideration under applicable federal and state laws pertaining to any such site. | | ✓ |
|--|--|---|

Area C Route Comparison

CEC Issuance Criteria	Preferred Route	Compromise (Green) Route
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10. The committee shall give special consideration to the protection of are as unique because of biological wealth or because they are habitats for rare and endangered species.

Area C Route Comparison

Compromise
(Green) Route

Preferred Route

CEC Issuance Criteria

1. Existing plans of the state, local government and private entities for other developments at or in the vicinity of the proposed site. ✓
2. Fish, wildlife and plan life and associated forms of life upon which they are dependent. ✓
3. Noise emission levels and interference with communication signals. ✓
4. The proposed availability of the site to the public for recreational purposes, consistent with safety considerations and regulations.
5. Existing scenic areas, historic sites and structures or archaeological sites at or in the vicinity of the proposed site.
6. The total environment of the area.
7. The technical practicality of achieving a proposed objective and the previous experience with equipment and methods available for achieving a proposed objective. Relied on by P&LSC to inquire re Transmission Adequacy.
8. The estimated cost of the facilities and site as proposed by the applicant and the estimated cost of the facilities and site as recommended by the committee, recognizing that any significant increase in costs represents a potential increase in the cost of electric energy to the customers or the applicant. ✓
9. Any additional factors which require consideration under applicable federal and state laws pertaining to any such site. ✓
10. The committee shall give special consideration to the protection of areas unique because of biological wealth or because they are habitats for rare and endangered species.